

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:20-cr-24

vs.

Hon. PAUL L. MALONEY  
United States District Judge

MUSTAFA DEVILLE REYNOLDS,  
also known as “J,”

Defendant.

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**EXHIBIT 40 TO GOVERNMENT’S RESPONSE IN OPPOSITION  
TO DEFENDANT’S MOTION TO EXCLUDE CELL SITE ANALYSIS**

## **Work History**

### **ZetX Inc.**

2013-Present

(844) 367-9389

President - Founder  
1900 W Chandler Blvd  
Suite 15-224  
Chandler, Az 85224

### **Gilbert Police Department**

1999-2014

(480) 503-6500

Sergeant/Officer/SWAT  
75 E. Civic Center Dr.  
Gilbert, Arizona 85296

### **Phoenix Training Council**

2006-2013

(480) 540-3461

Owner/Trainer  
3130 N. Arizona Ave.  
Chandler, AZ 85225

### **Show Low Police Department**

1996-1999

(928) 537-5091

Officer  
150 N. 6<sup>th</sup> Street  
Show Low, Arizona 85908

### **Military Professional Resources Inc. L3**

2010

(703) 664-2950

Trainer  
1320 Braddock Place  
Arlington, Virginia 22314

## **Applicable Experience:**

20 years of law enforcement experience

5 years of patrol operations

13 years of criminal investigations-

7 years in violent crime, sex crime, and narcotic investigations

3 years as a Detective Sergeant in violent crime investigations

2 years on the Criminal Apprehension Team

1 year in undercover operations in Afghanistan

8 years SWAT/Tactical Operations experience

7 years instructor/operator of law enforcement training company

**Experience Summary:****Criminal Investigations**

Over 300 death investigations including:

- Gang related homicides
- Murders by organized crime syndicates (Cartels)
- Investigations of officer use of force & suspect use of force against officers

Over 150 robbery investigations including:

- Gang related robberies

Over 30 kidnapping investigations including:

- Most pertaining to Mexican Drug Cartel related
- Kidnappings committed by members of organized crime syndicates

Over 100s of assault, sexual assault, organized crime, arson, arson related homicide, auto theft, narcotics, property crime, and public corruption of funds investigations

**Supervision of Investigations Unit**

Supervise and direct criminal investigations related to violent crime and narcotic investigations

- VICE operations and undercover operations
- Provided direction of up to 30 investigators during complex and dynamic cases
- Provided mentoring and training in reference to investigations of violent crimes or other crimes as needed

**Specialty Training in reference to Criminal Investigations**

- Bullet trajectory and gunshot wound patterns
- Blood spatter interpretation
- Crime scene management and processing
- Cell phone analysis
- Interviewing and interrogation
- Provided instruction to Military units in reference to tactical questioning and interviewing techniques (10<sup>th</sup> Special Forces Group, Fort Carson, Co.)
- Statement analysis- LSI (Avinoam Sapir)
- Terrorism- Investigation of Response to Terrorists Threats/Activities
- Kidnapping (specifically as it pertains to organized crime)
- Narcotic Investigations
- Recruiting, managing and directing confidential informants
- Undercover/Clandestine Operations:
- Assigned to DEA task force in reference to investigations involving Mexican Drug Cartel- successfully dismantled operation
- Assigned to DEA task force in reference to investigation criminal syndicates/outlaw motorcycle gangs-Investigation resulted in the largest

seize of precursor chemicals used to produce methamphetamine in the U.S.

- High-risk surveillance and street jumps
- Instructor in Arizona for both tactical elements and investigative elements
- Gang investigations- Criminal Street Syndicates
- Use of RF (radio frequency) related devices for both tactical operations and investigative resources

### **Specialty Training in reference to SWAT**

Basic SWAT entry school X3

Advanced SWAT entry school- Countermeasures Technical Institute

Hostage Rescue Tactics Training

Instructor Certified for Less Lethal, Flash/Stun Distraction Devices and Chemical Agents

SCBA Certified for Tactical Environments

Sub –Machine Gun Qualified

Tactical Firearms

- Low light & no light environments
- Colt M-4

Type III SWAT Training (DHS Office of Domestic Preparedness)

- Introduction to Worldwide Terrorism
- Weapons of Mass Destruction
- Protection Levels and Operations
- Scouting, Pre-Planning, Intelligence
- Tactical Movements
- Tactical Breathing
- Occupancy Control
- IED and Explosive Materials
- Citizen and Team Member Recovery
- Vehicle Assaults
- Hostage Rescue
- TIC/TOC Operations
- CBRNE Operations

Tactical Operation Packets and Briefings

Served as a Tactical Team Leader

Extensive Experience in scouting and planning of tactical operations in urban environments

### **Cellular Tracking and Operations in a Tactical Environment**

Instructor

Development of training courses

Trained tactical units integration into high-risk cellular tracking missions in the field

**Undercover Operations (Afghanistan)**

- Mentored 10 man undercover Afghan Police Team targeting IED cells operation in a battlefield. The mission objective was to penetrate and exploit improvised explosives used against coalition troops.
- Created and executed action plans in the battlefield targeting IED cells and equipment once identified.
- Mentored Afghan Police on investigative techniques and rule of law applications
- Advanced investigations in relation to IED detonation—including device mechanism identification (ATF Advanced Course)
- Consulting of Rule of Law concerning policies and procedures. This covered all aspects from development of basic legislation to formalizing criminal investigations and courtroom procedures.

**Fields of Expertise****Cellphones and radio frequency devices**

- Extensive background in cellular devices in reference to criminal investigations
- Subject Matter Expert in: call detail record analysis, historical tracking, real-time/physical tracking of mobile devices (geolocation), site surveys, and RF identification.
- Extensive use of DRT Tracking equipment (Digital Receiver Technology)
- Technical applications of Rhode and Schwarz TSME Scanning Equipment
- Experience in Denial of Service (RF jamming)
- Data collection
- Black Phone Operations (identifying and targeting unknown cellular devices)
  - Provided expert court testimony and consulting as a subject matter expert in the field
  - Recognized nationally by the International Chiefs of Police and Parade Magazine for my work in this field
- Designed and developed radio frequency sensors that detect wireless devices. Sensors were used by the NFL during the 2016 NFL Super Bowl for drone protection.
- Provided expert testimony and court consultation in Arizona, Utah, Montana, Colorado, Virginia, Florida, Texas, New York and California

**ZetX Corporation**

- Development and implementation of a national cell tower database for the United States. Database has coverage areas defined for each sector—Over 3.1 million coverage overlays. Extensive RF mapping and link budget analysis completed in multiple environments.
- Automated call detail record processing- responsible for the program development and implementation. Extensive research and coordination required automating and standardizing call detail records sent by providers to law enforcement for investigative purposes.
- Instructor for all training courses—including ZetX 40 hour Advance Certification Course, the only 40-hour Certification Course offered in the United States.

**Instructing**

- Over 15 years of experience in developing training outlines, objectives, and Power Point presentations, implementation of training concepts, and debrief/after action reports on programs impact
- Arizona Peace Officer and Standards Training Board certified instructor
- Extensive background in reference to providing instruction and training all disciplines listed
- Guest speaker for various conference and convention in the United States and Canada
- Instructed for over 8,000 students nationally and internationally
  - Law Enforcement, Prosecutors, Judges, Defense Experts

**Attributes**

- Coordination of training exercise for 10<sup>th</sup> Group Special Forces
  - Arranged training schedules, facilities, instruction and participation in training events that incorporated full mission profiles for Special Operation Forces. The exercises were pre-mission training for combat deployments in Operation IRAQ FREEDOM. Six separate concepts completed in 2003-2009. Training concepts mentioned above include
    - Sensitive Site Exploitation
    - Close Quarters Combat
    - Flat Range Exercises/Live Fire Scenarios

**Recent Case References – Expert Testimony (2016-2018)**

- State of Arizona v. Sharpe & Hernandez (Pinal County Superior Court)
  - Armed Robbery
- State of Arizona v. Craig (Pinal County Superior Court)
  - Homicide
- State of Montana v. Johnston (Richland County District Court)
  - Homicide
- State of New York v. Clayton (Steuben County District Court) – Frye Challenge
  - Homicide
- State of California v. Dinh, Hicks, & Tran (Sacramento District Court) – Frye Challenge
  - Homicide
- State of Utah v. Evans (Salt Lake County Superior Court)
  - Homicide
- State of Texas v. Ross (Dallas County District Court) – 702 Challenge
  - Homicide
- State of New York v. Meyer (Steuben County District Court)
  - Homicide
- State of Arizona v. Howe (Pima County Superior Court)
  - Aggravated Assault/Attempt Homicide
- State of California v. Marquez (Tulare County District Court)
  - Armed Robbery

## Curriculum Vitae

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- State of California v. Ernesto Hernandez (Monterey County District Court)
  - Homicide
- State of California v. Phil Ayala, Martinez, Luna, Rivera (Shasta County District Attorney)
  - Robbery x4
- State of Colorado v. Samuel Pinney (16CR742) (Weld County District Attorney) - Shreck (Daubert) Hearing
  - Double Homicide
- State of Texas v. Antonio Cochran (F17-76529H) (Dallas County District Attorney)
  - Homicide
- State of Arizona v. Freddis Williams (CR2017-109768-001)(Maricopa County District Attorney)
  - Homicide
- State of California v. Ingala Whiting (Orange County District Court)
  - Homicide
- State of Florida v. Alexis Vila Perdomo and Roberto Isaac (Miami Office of the State Attorney)
  - Homicide
- State of Vermont v. Steven Bourgoïn (VT Superior Court)
  - Second Degree Murder x5